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18 Attorneys for Named and the FLSA Collective

19  
20 UNITED STATES DISTRICT COURT  
21  
22 CENTRAL DISTRICT OF CALIFORNIA

23 LUIZA COLE, individually, and RUTH  
24 MCKNIGHT, individually, on behalf of  
themselves and all those similarly situated,

25 Plaintiffs,

26 vs.

27 COUNTY OF ORANGE,

28 Defendant.

Case No. 8:18-cv-01020-DOC-KES

**NOTICE OF PLAINTIFFS'  
UNOPPOSED MOTION AND  
MOTION FOR APPROVAL OF  
SETTLEMENT OF FLSA  
COLLECTIVE ACTION AND  
REQUEST FOR ATTORNEYS' FEES,  
COSTS AND INCENTIVE AWARDS**

Date: May 18, 2020  
Time: 8:30 a.m.  
Ctrm.: 9D

Action Filed: June 11, 2018

1 **TO THE COURT AND ALL PARTIES OF RECORD:**

2 **PLEASE TAKE NOTICE** that on May 18, 2020 at 8:30 a.m. in Courtroom 9D  
3 of the United States District Court for the Central District of California, located at 411  
4 West 4<sup>th</sup> Street, Santa Ana, California 92701, Plaintiffs Luiza Cole and Ruth McKnight  
5 ("Plaintiffs") will and hereby do move for an order:

- 6 1. Approving the Stipulation of Collective Action Settlement and Release  
7 between the parties;
- 8 2. Awarding Class Counsel \$250,000.00 in attorneys' fees and \$12,484.75 in  
9 litigation costs;
- 10 3. Awarding Plaintiff Luiza Cole an incentive award of \$5,000.00; and
- 11 4. Awarding Plaintiff Ruth McKnight an incentive award of \$5,000.00.

12 This Motion is based on this Notice of Motion and Motion, the supporting  
13 Memorandum of Points and Authorities, the Declaration of Scott H. Sims, the  
14 Declaration of Luiza Cole, the Declaration of Ruth McKnight, the Declaration of  
15 Kristopher P. Badame, and such other and further material to be offered at the hearing.

17 Dated: April 20, 2020

FRANK SIMS & STOLPER LLP

19 By: /s/ Scott H. Sims  
20 JASON M. FRANK  
21 SCOTT H. SIMS  
22 Attorneys for Plaintiffs and all those  
23 similarly situated